

Navajo Gen. Station
Excess Emission Report
Second Quarter 2015

cont. (1)

NAVAJO GENERATING STATION

EXCESS EMISSIONS REPORT

SECOND QUARTER, 2015

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
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ROBERT K. TALBOT
Manager

July 29, 2015

CERTIFIED MAIL

Director, Navajo Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Director, Air Division
U.S. Environmental Protection Agency, Region IX
Mail Code: AIR-5
75 Hawthorne Street
San Francisco, CA 94105

RE: Navajo Generating Station FIP – 40 CFR §49.24, Title V Permit to Operate No. NN-ROP-05-06 and PSD Permit Number AZ 08-01 Quarterly Emission Report

Dear Director's,

Enclosed is the Second Quarter 2015 emissions report for Navajo Generating Station. The report contains the following information:

- Daily electrical energy generated in megawatt-hours (permit condition II.B.5.b).
- Sulfur dioxide and carbon dioxide information according to the procedures set forth at 40 CFR 60.7 and permit condition II.B.5.a;
- Identification of periods when opacity values exceeded 20 %, excluding condensed uncombined water droplets over any 6-minute period, and 40% averaged over 6 minutes, during absorber upset transition periods.
- Identification of periods when sulfur dioxide emissions exceeded 1.0 lb/mmBTU as a plantwide 3-hour average, and a CEMS data assessment according to the procedures set forth at 40 CFR §49.24(d)(1) of NGS FIP.

Page Two
July 29, 2015

- Nitrogen Oxide and Carbon Monoxide information according to PSD Permit Number AZ 08-01A, condition IX.G.5

With respect to the opacity data presented in the report, please note that 6-minute opacity readings are not individually listed during scrubber operations because the saturated stack conditions impedes the accuracy of the readings. The report identifies the block time periods for each unit that the scrubbers were operational and the stacks were saturated, in lieu of reporting the individual 6-minute wet stack readings.

Please contact Paul Ostapuk at (928) 645-6577 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'RT', written over a horizontal line.

Robert K. Talbot
Plant Manager / Responsible Official

Enclosures

cc: Barbara Sprungl, SRP – Manager Air Quality & Environmental Services
Environmental File

CEM EXCESS EMISSION REPORT

Salt River Project
Navajo Generating Station
Page, Arizona

UNIT # 1, 2, 3

YEAR 2015

QUARTER SECOND

This report is in accordance with reporting requirements set forth in the NGS FIP – 40 CFR §49.24, Title V Permit to Operate, Permit No. NN-ROP 05-06, Section II.B.5 and PSD Permit Number AZ 08-01A, Condition IX.G.5.

Emission standards in this report are in accordance with the NGS FIP – 40 CFR §49.24 sections (d)(1), (d)(3), (d)(4), (e)(8), Title V Permit to Operate, NN-ROP-05-06 Section II.B.2 and PSD Permit Number AZ 08-01A Conditions IX.B.1 and IX.B.2

EXCESS EMISSIONS FOR QUARTER: None

NAVAJO GENERATING STATION
CEM SUMMARY SHEET
SECOND QUARTER OF 2015

	<u>UNIT 1</u>	<u>UNIT 2</u>	<u>UNIT 3</u>
# Hours of I.D. Fan Operation	2080.0 hrs	2184.0 hrs	1874.1 hrs
# Hours Boiler Operation	2056.8 hrs	2183.3 hrs	1808.5 hrs
Opacity Monitor Availability	99.90 %	99.93 %	99.91 %
SO2 #/mmBTU Availability	99.85 %	99.77 %	98.94 %
NOx #/mmBTU Availability	99.80 %	99.77 %	95.96 %
CO #/mmBTU Availability	99.85 %	99.77 %	98.94 %
Opacity Emission >20% (6-Min)	0.0 hrs	0.0 hrs	0.0 hrs
% Operating Time	0.00 %	0.00 %	0.00 %
Opacity Emission >40% (6-Min)	0.0 hrs	0.0 hrs	0.0 hrs
% Operating Time	0.00 %	0.00 %	0.00 %
SO2 #/mmBTU > 0.1 (365BOD)	0.0 days	0.0 days	0.0 days
% Operating Time	0.00 %	0.00 %	0.00 %
SO2 #/mmBTU >1.0 (3Hr)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
NOx #/mmBTU >0.24 (30D)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
CO #/mmBTU >0.23 (30D)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
CO #/mmBTU >0.15 (12M)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
Plant Coal, Ash and Road Sweeping Activities - Opacity Emission \geq 20% (hours)	0.0 hrs		

**NAVAJO GENERATING STATION
CEMS MONITOR LISTING**

Teledyne Monitor Labs Inc.
Opacity Monitor
Model Lighthawk 560

Teledyne Monitor Labs Inc.
Flow Monitor
Ultra Flow 150

Thermo Environmental Sulfur Dioxide Monitor
Model 43i

Thermo Environmental CO₂ Monitor
Model 410i

Thermo Environmental NO_x Monitor
Model 42i

Thermo Environmental CO Monitor
Model 48i

UNIT 1 REPORT SUMMARY

- Daily Electric Energy Report
- Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- Excess Dry Opacity Report
- Opacity Downtime Report
- SO₂ Excess Emission and Monitoring System Performance
- SO₂ Excess Emission Report – 1.0 lb/mmBTU
- SO₂ Excess Emission Report – 0.1 lb/mmBTU
- SO₂ Downtime Report
- CO₂ Downtime Report
- NO_x Excess Emission Report
- NO_x Downtime Report
- CO Excess Emission Report- 30-Day
- CO Excess Emission Report- 12-Month
- CO Downtime Report

40 CFR 52.145.d.5.iii Daily Electric Energy Report
Gigawatt Hours

Source: Unit 1 Channel: 1 GW365

Report for 04/01/2015 thru 06/30/2015

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
04/01/15	17.56	05/01/15	16.34	06/01/15	14.65
04/02/15	16.17	05/02/15	16.25	06/02/15	14.08
04/03/15	17.46	05/03/15	16.28	06/03/15	13.19
04/04/15	16.71	05/04/15	18.53	06/04/15	13.87
04/05/15	16.71	05/05/15	18.31	06/05/15	13.19
04/06/15	15.39	05/06/15	14.74	06/06/15	14.41
04/07/15	15.49	05/07/15	15.16	06/07/15	13.26
04/08/15	15.68	05/08/15	14.39	06/08/15	15.98
04/09/15	16.37	05/09/15	12.12	06/09/15	17.73
04/10/15	-----	05/10/15	12.91	06/10/15	17.51
04/11/15	-----	05/11/15	17.27	06/11/15	16.68
04/12/15	-----	05/12/15	14.40	06/12/15	14.77
04/13/15	-----	05/13/15	14.21	06/13/15	15.31
04/14/15	-----	05/14/15	16.18	06/14/15	14.12
04/15/15	-----	05/15/15	16.18	06/15/15	16.41
04/16/15	-----	05/16/15	12.92	06/16/15	15.46
04/17/15	15.17	05/17/15	13.13	06/17/15	15.84
04/18/15	15.94	05/18/15	18.14	06/18/15	15.55
04/19/15	16.49	05/19/15	18.64	06/19/15	15.16
04/20/15	16.83	05/20/15	15.50	06/20/15	15.23
04/21/15	17.74	05/21/15	15.41	06/21/15	14.56
04/22/15	17.05	05/22/15	12.18	06/22/15	15.15
04/23/15	17.23	05/23/15	14.70	06/23/15	15.60
04/24/15	18.17	05/24/15	17.04	06/24/15	16.73
04/25/15	17.03	05/25/15	9.46	06/25/15	16.90
04/26/15	14.68	05/26/15	11.83	06/26/15	16.37
04/27/15	14.38	05/27/15	15.05	06/27/15	16.11
04/28/15	16.43	05/28/15	14.33	06/28/15	16.10
04/29/15	18.79	05/29/15	14.48	06/29/15	17.11
04/30/15	16.81	05/30/15	15.00	06/30/15	17.29
		05/31/15	16.09		

----- Invalid Boiler Operating Day

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 04/01/2015 00:00 through 06/30/2015 23:59

Pollutant: Opacity / "1 Opacity"
Emission Limit: 40

Company Name: SRP - Navajo, Unit 1
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

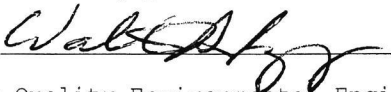
Total source operating time in reporting period: 2080.0 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.3
c. Process Problems.....	0.0	c. Quality Assurance.....	0.9
d. Exempt (Wet Stack - Scrubber Operation)	2080.0	d. Other Known Monitor Downtime Cause.....	0.8
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	2.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.10%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: 

Title: Air Quality Environmental Engineer

Date: 7/29/2015

Navajo Unit 1 Excess Wet Opacity Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason	Action
04/01/15 00:00 - 04/11/15 18:41		258.7	Wet Scrubber Operation	Exempt
04/16/15 02:40 - 06/30/15 23:59		1821.3	Wet Scrubber Operation	Exempt

Total Duration: 2080.0 Hours

Navajo Unit 1 Excess Dry Opacity Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason
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Total Duration 0.0 Hours

Navajo Unit 1 Opacity Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
04/16/15 02:36 - 04/16/15 02:41	06	Data Controller Malfunction	
04/22/15 10:06 - 04/22/15 10:11	06	Data Controller Malfunction	
04/30/15 14:36 - 04/30/15 10:41	06	Preventative Maintenance Activities	
06/08/15 09:12 - 06/08/15 10:05	54	Quality Assurance Activities	
06/09/15 23:18 - 06/09/15 23:23	06	Data Controller Malfunction	
06/11/15 13:00 - 06/11/15 13:11	12	Preventative Maintenance Activities	
06/21/15 02:18 - 06/21/15 02:47	30	Preventative Maintenance Activities	

TOTAL DURATION = 2.0 Hours

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 04/01/2015 00:00 through 06/30/2015 23:59

Pollutant: SO2 lb/mmBTU (365 Boiler Operating Day rolling average)
Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 1
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant


Total source operating time in reporting period: 2056.8 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.0
c. Process Problems.....	0.0	c. Quality Assurance.....	1.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause.....	2.0
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	0.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.15%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: 

Title: Air Quality Environmental Engineer

Date: 7/29/2015

Navajo Unit 1 SO2 Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 1.0 lb/mmBTU, 3 hr. plant wide average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 1 SO2 Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.1 lb/mmBTU, 365 BOD rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 1 SO2 Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 SO2 ppm SOURCE: Unit 1 EPISODE: SO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
05/14/15 10:00 - 05/14/15 11:59		2	Preventative Maintenance Activities
05/14/15 16:00 - 05/14/15 16:59		1	Preventative Maintenance Activities

Total Duration = 3.0 hrs

Navajo Unit 1 CO2 Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 CO2 cor SOURCE: Unit 1 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
05/14/15 10:00 - 05/14/15 11:59		2	Preventative Maintenance Activities
05/14/15 16:00 - 05/14/15 16:59		1	Preventative Maintenance Activities
05/18/15 09:00 - 05/18/15 09:59		1	Quality Assurance Activities

Total Duration = 4.0 hrs

Navajo Unit 1 NOx Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.24 lb/mmBTU, 30 Day rolling average

Date and Time Period	Magnitude	Reason
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 1 NOx Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 NOx cor SOURCE: Unit 1 EPISODE: NOx Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
05/14/15 10:00 - 05/14/15 11:59		2	Preventative Maintenance Activities
05/14/15 16:00 - 05/14/15 16:59		1	Preventative Maintenance Activities
05/18/15 09:00 - 05/18/15 09:59		1	Quality Assurance Activities

Total Duration = 4.0 hrs

Navajo Unit 1 CO Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.23 lb/mmBTU, 30 Day rolling average

Date and Time Period	Magnitude	Reason
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 1 CO Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.15 lb/mmBTU, 12-Month rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 1 CO Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 CO cor SOURCE: Unit 1 EPISODE: CO Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
05/14/15 10:00 - 05/14/15 11:59		2	Preventative Maintenance Activities
05/14/15 16:00 - 05/14/15 16:59		1	Preventative Maintenance Activities

Total Duration = 3.0 hrs

UNIT 2 REPORT SUMMARY

- Daily Electric Energy Report
- Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- Excess Dry Opacity Report
- Opacity Downtime Report
- SO₂ Excess Emission and Monitoring System Performance
- SO₂ Excess Emission Report – 1.0 lb/mmBTU
- SO₂ Excess Emission Report – 0.1 lb/mmBTU
- SO₂ Downtime Report
- CO₂ Downtime Report
- NO_x Excess Emission Report
- NO_x Downtime Report
- CO Excess Emission Report- 30-Day
- CO Excess Emission Report- 12-Month
- CO Downtime Report

40 CFR 52.145.d.5.iii Daily Electric Energy Report
Gigawatt Hours

Source: Unit 2 Channel: 2 GW365

Report for 04/01/2015 thru 06/30/2015

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
04/01/15	17.38	05/01/15	15.82	06/01/15	13.70
04/02/15	16.33	05/02/15	16.07	06/02/15	12.33
04/03/15	17.66	05/03/15	16.48	06/03/15	12.71
04/04/15	16.52	05/04/15	17.92	06/04/15	12.74
04/05/15	16.11	05/05/15	18.04	06/05/15	11.73
04/06/15	15.06	05/06/15	14.98	06/06/15	12.86
04/07/15	15.48	05/07/15	14.61	06/07/15	14.03
04/08/15	15.77	05/08/15	14.94	06/08/15	14.22
04/09/15	15.89	05/09/15	13.95	06/09/15	17.66
04/10/15	16.28	05/10/15	14.62	06/10/15	-----
04/11/15	17.84	05/11/15	17.37	06/11/15	-----
04/12/15	17.57	05/12/15	14.31	06/12/15	13.61
04/13/15	17.67	05/13/15	13.30	06/13/15	13.16
04/14/15	15.14	05/14/15	14.10	06/14/15	13.27
04/15/15	18.43	05/15/15	16.21	06/15/15	14.17
04/16/15	17.14	05/16/15	11.36	06/16/15	15.26
04/17/15	14.81	05/17/15	12.18	06/17/15	15.27
04/18/15	15.16	05/18/15	15.39	06/18/15	15.17
04/19/15	16.04	05/19/15	13.69	06/19/15	14.81
04/20/15	16.32	05/20/15	19.02	06/20/15	14.91
04/21/15	17.55	05/21/15	15.46	06/21/15	15.19
04/22/15	17.09	05/22/15	11.94	06/22/15	14.68
04/23/15	17.19	05/23/15	10.45	06/23/15	15.70
04/24/15	17.76	05/24/15	13.41	06/24/15	16.60
04/25/15	15.62	05/25/15	18.37	06/25/15	16.61
04/26/15	14.15	05/26/15	16.93	06/26/15	16.19
04/27/15	14.07	05/27/15	16.69	06/27/15	16.29
04/28/15	16.26	05/28/15	14.48	06/28/15	15.95
04/29/15	17.11	05/29/15	14.94	06/29/15	17.02
04/30/15	16.34	05/30/15	16.59	06/30/15	17.19
		05/31/15	15.93		

----- Invalid Boiler Operating Day

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 04/01/2015 00:00 through 06/30/2015 23:59

Pollutant: Opacity / "2 Opacity"
Emission Limit: 40

Company Name: SRP - Navajo, Unit 2
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2184.0 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.00
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.5
c. Process Problems.....	0.0	c. Quality Assurance.....	0.9
d. Exempt (Wet Stack - Scrubber Operation)	2184.0	d. Other Known Monitor Downtime Cause.....	0.2
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	1.6
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.07%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: 

Title: Air Quality Environmental Engineer

Date: 7/29/2015

Navajo Unit 2 Excess Wet Opacity Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 2 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason	Action
04/01/15 00:00 - 06/30/15 23:59		2184.0	Wet Scrubber Operation	Exempt

Total Duration: 2184.0 Hours

Navajo Unit 2 Excess Dry Opacity Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason
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Total Duration 0.0 Hours

Navajo Unit 2 Opacity Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 2 Opacity SOURCE: Unit 2 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
04/13/15 09:06 - 04/13/15 09:17	06	Data Controller Malfunction	
04/14/15 08:00 - 04/14/15 08:05	06	Data Controller Malfunction	
04/21/15 07:36 - 04/21/15 07:41	06	Data Controller Malfunction	
04/22/15 08:06 - 04/22/15 08:11	06	Data Controller Malfunction	
04/23/15 12:30 - 04/23/15 12:35	06	Data Controller Malfunction	
04/30/15 13:36 - 04/30/15 13:41	06	Preventative Maintenance Activities	
06/08/15 10:30 - 06/08/15 11:23	54	Quality Assurance Activities	
06/10/15 15:42 - 06/10/15 15:42	06	Preventative Maintenance Activities	

TOTAL DURATION = 1.6 Hours

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 04/01/2015 00:00 through 06/30/2015 23:59

Pollutant: SO2 lb/mmBTU (365 Boiler Operating Day rolling average)
Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 2
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2183.3 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.0
c. Process Problems.....	0.0	c. Quality Assurance.....	1.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause.....	4.0
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	5.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.23%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statment(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: Walter H. Begay

Title: Air Quality Environmental Engineer

Date: 7/29/2015

Navajo Unit 2 SO2 Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 1.0 lb/mmBTU, 3 hr. plant wide average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 2 SO2 Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.1 lb/mmBTU, 365 BOD rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 2 SO2 Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 2 SO2 ppm SOURCE: Unit 2 EPISODE: SO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/13/15 07:00 - 04/13/15 07:59		1	Quality Assurance Activities
05/14/15 14:00 - 05/14/15 15:59		2	Preventative Maintenance Activities
05/15/15 08:00 - 05/15/15 09:59		2	Preventative Maintenance Activities

Total Duration = 5.0 hrs

Navajo Unit 2 CO2 Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 2 CO2 cor SOURCE: Unit 2 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/13/15 07:00 - 04/13/15 07:59		1	Quality Assurance Activities
05/14/15 14:00 - 05/14/15 15:59		2	Preventative Maintenance Activities
05/15/15 08:00 - 05/15/15 09:59		2	Preventative Maintenance Activities

Total Duration = 5.0 hrs

Navajo Unit 2 NOx Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.24 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 2 NOx Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 2 NOx cor SOURCE: Unit 2 EPISODE: NOx Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/13/15 07:00 - 04/13/15 07:59		1	Quality Assurance Activities
05/14/15 14:00 - 05/14/15 15:59		2	Preventative Maintenance Activities
05/15/15 08:00 - 05/15/15 09:59		2	Preventative Maintenance Activities

Total Duration = 5.0 hrs

Navajo Unit 2 CO Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.23 lb/mmBTU, 30 Day rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 2 CO Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.15 lb/mmBTU, 12-Month rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 2 CO Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 2 CO cor SOURCE: Unit 2 EPISODE: CO Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/13/15 07:00 - 04/13/15 07:59		1	Quality Assurance Activities
05/14/15 14:00 - 05/14/15 15:59		2	Preventative Maintenance Activities
05/15/15 08:00 - 05/15/15 09:59		2	Preventative Maintenance Activities

Total Duration = 5.0 hrs

UNIT 3 REPORT SUMMARY

- Daily Electric Energy Report
- Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- Excess Dry Opacity Report
- Opacity Downtime Report
- SO₂ Excess Emission and Monitoring System Performance
- SO₂ Excess Emission Report – 1.0 lb/mmBTU
- SO₂ Excess Emission Report – 0.1 lb/mmBTU
- SO₂ Downtime Report
- CO₂ Downtime Report
- NO_x Excess Emission Report
- NO_x Downtime Report
- CO Excess Emission Report- 30-Day
- CO Excess Emission Report- 12-Month
- CO Downtime Report

40 CFR 52.145.d.5.iii Daily Electric Energy Report
Gigawatt Hours

Source: Unit 3 Channel: 3 GW365

Report for 04/01/2015 thru 06/30/2015

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
04/01/15	-----	05/01/15	16.2	06/01/15	15.7
04/02/15	-----	05/02/15	16.8	06/02/15	14.5
04/03/15	-----	05/03/15	16.3	06/03/15	15.7
04/04/15	-----	05/04/15	18.4	06/04/15	13.6
04/05/15	-----	05/05/15	16.7	06/05/15	12.8
04/06/15	10.85	05/06/15	19.3	06/06/15	14.1
04/07/15	11.64	05/07/15	19.2	06/07/15	14.8
04/08/15	11.15	05/08/15	18.8	06/08/15	-----
04/09/15	14.34	05/09/15	17.4	06/09/15	-----
04/10/15	17.89	05/10/15	15.6	06/10/15	15.8
04/11/15	16.02	05/11/15	13.8	06/11/15	15.7
04/12/15	10.96	05/12/15	17.8	06/12/15	16.3
04/13/15	15.10	05/13/15	14.9	06/13/15	17.0
04/14/15	-----	05/14/15	16.5	06/14/15	16.5
04/15/15	-----	05/15/15	16.7	06/15/15	16.4
04/16/15	-----	05/16/15	13.2	06/16/15	14.8
04/17/15	-----	05/17/15	13.7	06/17/15	14.9
04/18/15	-----	05/18/15	15.6	06/18/15	15.5
04/19/15	-----	05/19/15	13.5	06/19/15	15.6
04/20/15	-----	05/20/15	17.5	06/20/15	14.9
04/21/15	-----	05/21/15	19.3	06/21/15	15.5
04/22/15	-----	05/22/15	18.7	06/22/15	-----
04/23/15	-----	05/23/15	13.5	06/23/15	-----
04/24/15	-----	05/24/15	12.1	06/24/15	16.1
04/25/15	-----	05/25/15	11.7	06/25/15	16.6
04/26/15	-----	05/26/15	15.6	06/26/15	16.3
04/27/15	14.74	05/27/15	14.1	06/27/15	16.5
04/28/15	16.21	05/28/15	15.9	06/28/15	15.8
04/29/15	16.14	05/29/15	13.77	06/29/15	16.7
04/30/15	16.67	05/30/15	13.37	06/30/15	16.9
		05/31/15	16.03		

----- Invalid Boiler Operating Day

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 04/01/2015 00:00 through 06/30/2015 23:59

Pollutant: Opacity / "3 Opacity"
Emission Limit: 40

Company Name: SRP - Navajo, Unit 3
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 1874.1 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.4
c. Process Problems.....	0.0	c. Quality Assurance.....	0.9
d. Exempt (Wet Stack - Scrubber Operation)	1874.1	d. Other Known Monitor Downtime Cause.....	0.4
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	1.7
3. Excess emission duration (%).....	0.0%	3. CEMS downtime (%).....	0.09%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

*Please see cover letter and attached "Written Notification Report for Excess Emissions and Control System Outage" for explanation of potential excess emissions.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statment(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: Walter H. Begay

Title: Air Quality Environmental Engineer

Date: 7/29/2015

Navajo Unit 3 Excess Wet Opacity Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 3 Opacity SOURCE: Unit 3 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason	Action
04/02/15 23:16 - 04/15/15 03:26		292.2	Wet Scrubber Operation	Exempt
04/26/15 02:05 - 06/30/15 23:59		1581.9	Wet Scrubber Operation	Exempt

Total Duration: 1874.1 Hours

Navajo Unit 3 Excess Dry Opacity Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason
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Total Duration 0.0 Hours

Navajo Unit 3 Opacity Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 3 Opacity SOURCE: Unit 3 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
04/06/15 01:06 - 04/06/15 01:11		06	Data Controller Malfunction
04/30/15 10:18 - 04/30/15 10:23		06	Preventative Maintenance Activities
04/30/15 14:12 - 04/30/15 14:17		06	Preventative Maintenance Activities
05/19/15 09:24 - 05/19/15 09:29		06	Preventative Maintenance Activities
05/26/15 17:00 - 05/26/15 17:05		06	Data Controller Malfunction
06/02/15 08:36 - 06/02/15 08:41		06	Data Controller Malfunction
06/08/15 13:24 - 06/08/15 14:17		54	Quality Assurance Activities
06/09/15 02:18 - 06/09/15 02:23		06	Data Controller Malfunction
06/10/15 16:18 - 06/10/15 16:23		06	Preventative Maintenance Activities

TOTAL DURATION = 1.7 Hours

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 04/01/2015 00:00 through 06/30/2015 23:59

Pollutant: SO2 lb/mmBTU (365 Boiler Operating Day rolling average)
Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 3
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 1808.5 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	17.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.0
c. Process Problems.....	0.0	c. Quality Assurance.....	2.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause.....	2.0
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	21.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	1.16%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: Walter H. Begay

Title: Air Quality Environmental Engineer

Date: 7/29/2015

Navajo Unit 3 SO2 Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 1.0 lb/mmBTU, 3 hr. plant wide average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 3 SO2 Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.1 lb/mmBTU, 365 BOD rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 3 SO2 Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 3 SO2 ppm SOURCE: Unit 3 EPISODE: SO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/04/15 07:00 - 04/04/15 22:59		16	Communications Failure - OOC during extended startup
04/05/15 05:00 - 04/05/15 05:59		1	Communications Failure - OOC during extended startup
05/18/15 13:00 - 05/18/15 14:59		2	Preventative Maintenance Activities
05/18/15 15:00 - 05/18/15 15:59		1	Quality Assurance Activities
05/20/15 14:00 - 05/20/15 14:59		1	Quality Assurance Activities

Total Duration = 21.0 hrs

Navajo Unit 3 CO2 Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 3 CO2 cor SOURCE: Unit 3 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/04/15 07:00 - 04/04/15 22:59		16	Communications Failure - OOC during extended startup
04/05/15 05:00 - 04/05/15 23:59		17	Communications Failure - OOC during extended startup
05/18/15 13:00 - 05/18/15 14:59		2	Preventative Maintenance Activities
05/18/15 15:00 - 05/18/15 15:59		1	Quality Assurance Activities
05/20/15 14:00 - 05/20/15 14:59		1	Quality Assurance Activities
05/29/15 05:00 - 05/30/15 16:59		36	Monitor Malfunction

Total Duration = 73.0 hrs

Navajo Unit 3 NOx Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.24 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 3 NOx Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 3 NOx cor SOURCE: Unit 3 EPISODE: NOx Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/04/15 07:00 - 04/04/15 22:59		16	Communications Failure - OOC during extended startup
04/05/15 05:00 - 04/05/15 23:59		17	Communications Failure - OOC during extended startup
05/18/15 13:00 - 05/18/15 14:59		2	Preventative Maintenance Activities
05/18/15 15:00 - 05/18/15 15:59		1	Quality Assurance Activities
05/20/15 14:00 - 05/20/15 14:59		1	Quality Assurance Activities
05/29/15 05:00 - 05/30/15 16:59		36	Diluent Monitor Malfunction

Total Duration = 73.0 hrs

Navajo Unit 3 CO Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.23 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 3 CO Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

Emission Limit: 0.15 lb/mmBTU, 12-Month rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 3 CO Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 04/01/2015 00:00
End: 06/30/2015 23:59

POLLUTANT: 3 CO cor SOURCE: Unit 3 EPISODE: CO Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
04/04/15 07:00 - 04/04/15 22:59		16	Communications Failure - OOC during extended startup
04/05/15 05:00 - 04/05/15 05:59		1	Communications Failure - OOC during extended startup
05/18/15 13:00 - 05/18/15 14:59		2	Preventative Maintenance Activities
05/18/15 15:00 - 05/18/15 15:59		1	Quality Assurance Activities
05/20/15 14:00 - 05/20/15 14:59		1	Quality Assurance Activities

Total Duration = 21.0 hrs

Nava jo Gen. Station
~~TX~~ Cens Emissions Report
Fourth Quarterly 2014

Navajo Gen. Station
~~TX~~ Gen Emissions Report
Fourth Quarterly 2014

NAVAJO GENERATING STATION

EXCESS EMISSIONS REPORT

FOURTH QUARTER, 2014

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298

ROBERT K. TALBOT
Manager

January 21, 2015

CERTIFIED MAIL

Dr. Deborah Jordon, Director
Air Division
Environmental Protection Agency
Region IX (AIR-1)
75 Hawthorne Street
San Francisco, California 94105

Mr. Steven Etsitty, Executive Director
Navajo Environmental Protection Administration
P.O. Box 339
Window Rock, Arizona 86515

RE: Navajo Generating Station FIP – 40 CFR §49.24, Title V Permit to Operate No. NN-ROP-05-06 and PSD Permit Number AZ 08-01 Quarterly Emission Report

Dear Dr. Jordon and Mr. Etsitty:

Enclosed is the Fourth Quarter 2014 emissions report for Navajo Generating Station. The report contains the following information:

- Daily electrical energy generated in megawatt-hours (permit condition II.B.5.b).
- Sulfur dioxide and carbon dioxide information according to the procedures set forth at 40 CFR 60.7 and permit condition II.B.5.a;
- Identification of periods when opacity values exceeded 20 %, excluding condensed uncombined water droplets over any 6-minute period, and 40% averaged over 6 minutes, during absorber upset transition periods.
- Identification of periods when sulfur dioxide emissions exceeded 1.0 lb/mmBTU as a plantwide 3-hour average, and a CEMS data assessment according to the procedures set forth at 40 CFR §49.24(d)(1) of NGS FIP.

Page Two
January 21, 2015

- Nitrogen Oxide and Carbon Monoxide information according to PSD Permit Number AZ 08-01A, condition IX.G.5

With respect to the opacity data presented in the report, please note that 6-minute opacity readings are not individually listed during scrubber operations because the saturated stack conditions impedes the accuracy of the readings. The report identifies the block time periods for each unit that the scrubbers were operational and the stacks were saturated, in lieu of reporting the individual 6-minute wet stack readings.

Please contact Paul Ostapuk at (928) 645-6577 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Talbot', with a long horizontal stroke extending to the right.

Robert K. Talbot
Plant Manager / Alternate Designated Representative

Enclosures

cc: Barbara Sprungl, SRP – Manager Air Quality & Lab Services
Environmental File

Summary

CEM EXCESS EMISSION REPORT

Salt River Project
Navajo Generating Station
Page, Arizona

UNIT # 1, 2, 3

YEAR 2014

QUARTER FOURTH

This report is in accordance with reporting requirements set forth in the NGS FIP – 40 CFR §49.24, Title V Permit to Operate, Permit No. NN-ROP 05-06, Section II.B.5 and PSD Permit Number AZ 08-01A, Condition IX.G.5.

Emission standards in this report are in accordance with the NGS FIP – 40 CFR §49.24 sections (d)(1), (d)(3), (d)(4), (e)(8), Title V Permit to Operate, NN-ROP-05-06 Section II.B.2 and PSD Permit Number AZ 08-01A Conditions IX.B.1 and IX.B.2

EXCESS EMISSIONS FOR QUARTER:

Unit 3 – 11/20/14 08:24 to 11/24/14 19:30 – Opacity, 6 minute (non-saturated stack)

Following a start-up of the Unit 3 Boiler with emission control equipment in operation, opacity readings were observed that were indicative of a sub-saturated stack. Normal operation of the wet limestone SO₂ scrubbers cause high opacity values that are exempt due to water vapor interferences. After confirming that the scrubber bypass guillotine was not a contributing factor affecting the observed opacity values, the boiler was removed from service to allow further investigation.

Inspection revealed partial pluggage of the spray headers inside the SO₂ Absorber. The pluggage was not great enough to significantly affect SO₂ compliance determinations but was enough to reduce the degree of stack saturation. After the spray headers were unplugged, the boiler was returned to service and the stack returned to a normal saturated state.

To be conservative, NGS reported the affected minutes as potential excess opacity emissions even though these values are considered suspect due to the sub-saturated stack conditions discussed above.

NAVAJO GENERATING STATION
CEM SUMMARY SHEET
FOURTH QUARTER OF 2014

	<u>UNIT 1</u>	<u>UNIT 2</u>	<u>UNIT 3</u>
# Hours of I.D. Fan Operation	2208.0 hrs	2205.4 hrs	2076.6 hrs
# Hours Boiler Operation	2208.0 hrs	2196.6 hrs	2055.0 hrs
Opacity Monitor Availability	99.91 %	99.90 %	99.89 %
SO2 #/mmBTU Availability	99.91 %	99.82 %	99.56 %
NOx #/mmBTU Availability	99.91 %	99.82 %	99.76 %
CO #/mmBTU Availability	99.91 %	99.82 %	99.76 %
Opacity Emission >20% (6-Min)	0.0 hrs	0.0 hrs	0.0 hrs
% Operating Time	0.00 %	0.00 %	0.00 %
Opacity Emission >40% (6-Min)	0.0 hrs	0.0 hrs	*89.6 hrs
% Operating Time	0.00 %	0.00 %	*4.31 %
SO2 #/mmBTU > 0.1 (365BOD)	0.0 days	0.0 days	0.0 days
% Operating Time	0.00 %	0.00 %	0.00 %
SO2 #/mmBTU >1.0 (3Hr)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
NOx #/mmBTU >0.24 (30D)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
CO #/mmBTU >0.23 (30D)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
CO #/mmBTU >0.15 (12M)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %

Plant Coal, Ash and Road Sweeping Activities - Opacity Emission $\geq 20\%$ (hours) 0.0 hrs

*See cover letter for explanation of potential Opacity Emissions Exceedances

**NAVAJO GENERATING STATION
CEMS MONITOR LISTING**

Teledyne Monitor Labs Inc.
Opacity Monitor
Model Lighthawk 560

Teledyne Monitor Labs Inc.
Flow Monitor
Ultra Flow 150

Thermo Environmental Sulfur Dioxide Monitor
Model 43i

Thermo Environmental CO₂ Monitor
Model 410i

Thermo Environmental NO_x Monitor
Model 42i

Thermo Environmental CO Monitor
Model 48i

copy

Unit 1

UNIT 1 REPORT SUMMARY

- Daily Electric Energy Report
- Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- Excess Dry Opacity Report
- Opacity Downtime Report
- SO₂ Excess Emission and Monitoring System Performance
- SO₂ Excess Emission Report – 1.0 lb/mmBTU
- SO₂ Excess Emission Report – 0.1 lb/mmBTU
- SO₂ Downtime Report
- CO₂ Downtime Report
- NO_x Excess Emission Report
- NO_x Downtime Report
- CO Excess Emission Report- 30-Day
- CO Excess Emission Report- 12-Month
- CO Downtime Report

40 CFR 52.145.d.5.iii Daily Electric Energy Report
Gigawatt Hours

Source: Unit 1 Channel: 1 GW365

Report for 10/01/2014 thru 12/31/2014

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
10/01/14	19.57	11/01/14	18.35	12/01/14	19.08
10/02/14	19.59	11/02/14	16.71	12/02/14	17.51
10/03/14	19.63	11/03/14	18.36	12/03/14	17.88
10/04/14	19.51	11/04/14	18.81	12/04/14	17.81
10/05/14	19.54	11/05/14	18.91	12/05/14	19.13
10/06/14	19.56	11/06/14	18.99	12/06/14	19.22
10/07/14	19.57	11/07/14	19.43	12/07/14	18.86
10/08/14	19.57	11/08/14	19.59	12/08/14	18.79
10/09/14	19.56	11/09/14	17.43	12/09/14	17.31
10/10/14	19.18	11/10/14	19.15	12/10/14	17.28
10/11/14	19.55	11/11/14	19.53	12/11/14	17.90
10/12/14	19.57	11/12/14	19.53	12/12/14	18.72
10/13/14	19.61	11/13/14	18.85	12/13/14	16.57
10/14/14	19.61	11/14/14	18.57	12/14/14	17.66
10/15/14	19.57	11/15/14	17.04	12/15/14	18.40
10/16/14	19.56	11/16/14	18.19	12/16/14	17.77
10/17/14	19.62	11/17/14	18.13	12/17/14	17.97
10/18/14	19.55	11/18/14	19.28	12/18/14	17.04
10/19/14	17.95	11/19/14	19.05	12/19/14	17.89
10/20/14	18.76	11/20/14	18.82	12/20/14	17.94
10/21/14	19.66	11/21/14	19.04	12/21/14	18.18
10/22/14	19.29	11/22/14	17.17	12/22/14	15.94
10/23/14	18.87	11/23/14	17.37	12/23/14	16.65
10/24/14	19.66	11/24/14	18.63	12/24/14	17.39
10/25/14	19.27	11/25/14	18.74	12/25/14	13.36
10/26/14	19.47	11/26/14	18.18	12/26/14	16.41
10/27/14	19.25	11/27/14	17.18	12/27/14	18.45
10/28/14	19.27	11/28/14	17.37	12/28/14	16.98
10/29/14	19.48	11/29/14	17.21	12/29/14	18.88
10/30/14	19.29	11/30/14	18.13	12/30/14	19.11
10/31/14	19.56			12/31/14	18.55

----- Invalid Boiler Operating Day

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 10/01/2014 00:00 through 12/31/2014 23:59

Pollutant: Opacity / "1 Opacity"
Emission Limit: 40

Company Name: SRP - Navajo, Unit 1
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

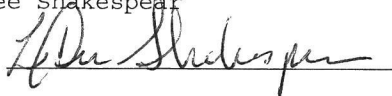
Total source operating time in reporting period: 2208.0 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.1
c. Process Problems.....	0.0	c. Quality Assurance.....	1.0
d. Exempt (Wet Stack - Scrubber Operation)	2208.0	d. Other Known Monitor Downtime Cause....	0.9
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	2.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.09%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: L Dee Shakespear

Signature: 

Title: Air Quality Environmental Engineer

Date: 1-15-15

Navajo Unit 1 Excess Wet Opacity Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason	Action
10/01/14 00:00 - 12/31/14 23:59		2208.0	Wet Scrubber Operation	Exempt

Total Duration: 2208.0 Hours

Navajo Unit 1 Excess Dry Opacity Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason
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Total Duration 0.0 Hours

Navajo Unit 1 Opacity Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
10/07/14 14:54 - 10/07/14 15:05		12	Preventative Maintenance Activities
11/06/14 14:06 - 11/06/14 14:11		06	Preventative Maintenance Activities
11/19/14 23:30 - 11/19/14 23:35		06	Data Controller Malfunction
11/25/14 14:24 - 11/25/14 14:41		18	Preventative Maintenance Activities
12/18/14 09:30 - 12/18/14 10:24		60	Quality Assurance Activities
12/23/14 14:00 - 12/23/14 14:17		18	Preventative Maintenance Activities

TOTAL DURATION = 2.0 Hours

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 10/01/2014 00:00 through 12/31/2014 23:59

Pollutant: SO2 lb/mmBTU (365 Boiler Operating Day rolling average)
Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 1
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2208.0 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	5.0
c. Process Problems.....	0.0	c. Quality Assurance.....	0.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause.....	2.0
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	2.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.09%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: L Dee Shakespear

Signature: L Dee Shakespear

Title: Air Quality Environmental Engineer

Date: 1-15-15

Navajo Unit 1 SO2 Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 1.0 lb/mmBTU, 3 hr. plant wide average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 1 SO2 Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.1 lb/mmBTU, 365 BOD rolling average

Date and Time Period	Magnitude	Reason
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 1 SO2 Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 SO2 ppm SOURCE: Unit 1 EPISODE: SO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
12/03/14 15:00 - 12/03/14 16:59		2	Preventative Maintenance Activities

Total Duration = 2.0 hrs

Navajo Unit 1 CO2 Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 CO2 cor SOURCE: Unit 1 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
12/03/14 15:00 - 12/03/14 16:59		2	Preventative Maintenance Activities

Total Duration = 2.0 hrs

Navajo Unit 1 NOx Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.24 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 1 NOx Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 NOx cor SOURCE: Unit 1 EPISODE: NOx Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
12/03/14 15:00 - 12/03/14 16:59		2	Preventative Maintenance Activities

Total Duration = 2.0 hrs

Navajo Unit 1 CO Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.23 lb/mmBTU, 30 Day rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 1 CO Excess Emission Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.15 lb/mmBTU, 12-Month rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 1 CO Downtime Report

SRP - Navajo, Unit 1
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 CO cor SOURCE: Unit 1 EPISODE: CO Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
12/03/14 15:00 - 12/03/14 16:59		2	Preventative Maintenance Activities

Total Duration = 2.0 hrs

Unit 2

UNIT 2 REPORT SUMMARY

- Daily Electric Energy Report
- Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- Excess Dry Opacity Report
- Opacity Downtime Report
- SO₂ Excess Emission and Monitoring System Performance
- SO₂ Excess Emission Report – 1.0 lb/mmBTU
- SO₂ Excess Emission Report – 0.1 lb/mmBTU
- SO₂ Downtime Report
- CO₂ Downtime Report
- NO_x Excess Emission Report
- NO_x Downtime Report
- CO Excess Emission Report- 30-Day
- CO Excess Emission Report- 12-Month
- CO Downtime Report

40 CFR 52.145.d.5.iii Daily Electric Energy Report
Gigawatt Hours

Source: Unit 2 Channel: 2 GW365

Report for 10/01/2014 thru 12/31/2014

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
10/01/14	18.48	11/01/14	17.40	12/01/14	18.45
10/02/14	19.34	11/02/14	16.44	12/02/14	17.31
10/03/14	19.20	11/03/14	18.01	12/03/14	18.06
10/04/14	19.24	11/04/14	18.44	12/04/14	17.14
10/05/14	19.24	11/05/14	19.06	12/05/14	14.82
10/06/14	19.18	11/06/14	18.17	12/06/14	15.08
10/07/14	19.40	11/07/14	18.36	12/07/14	15.50
10/08/14	19.32	11/08/14	18.70	12/08/14	17.42
10/09/14	18.54	11/09/14	16.83	12/09/14	16.59
10/10/14	18.73	11/10/14	17.70	12/10/14	16.96
10/11/14	19.22	11/11/14	18.13	12/11/14	17.65
10/12/14	18.56	11/12/14	18.61	12/12/14	18.25
10/13/14	19.05	11/13/14	18.30	12/13/14	16.28
10/14/14	19.45	11/14/14	18.35	12/14/14	14.46
10/15/14	18.75	11/15/14	17.60	12/15/14	16.17
10/16/14	18.98	11/16/14	18.25	12/16/14	17.61
10/17/14	18.91	11/17/14	17.76	12/17/14	16.86
10/18/14	18.34	11/18/14	18.05	12/18/14	8.64
10/19/14	17.58	11/19/14	18.44	12/19/14	-----
10/20/14	18.37	11/20/14	18.08	12/20/14	-----
10/21/14	18.57	11/21/14	18.61	12/21/14	-----
10/22/14	-----	11/22/14	16.98	12/22/14	16.41
10/23/14	-----	11/23/14	17.19	12/23/14	15.89
10/24/14	17.67	11/24/14	18.33	12/24/14	15.87
10/25/14	16.78	11/25/14	17.08	12/25/14	13.36
10/26/14	15.75	11/26/14	17.30	12/26/14	16.30
10/27/14	17.14	11/27/14	16.21	12/27/14	17.58
10/28/14	16.52	11/28/14	17.18	12/28/14	-----
10/29/14	17.21	11/29/14	16.10	12/29/14	18.44
10/30/14	17.35	11/30/14	17.94	12/30/14	19.03
10/31/14	18.73			12/31/14	18.70

----- Invalid Boiler Operating Day

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 10/01/2014 00:00 through 12/31/2014 23:59

Pollutant: Opacity / "2 Opacity"
Emission Limit: 40

Company Name: SRP - Navajo, Unit 2
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant


Total source operating time in reporting period: 2205.4 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.00
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.4
c. Process Problems.....	0.0	c. Quality Assurance.....	0.9
d. Exempt (Wet Stack - Scrubber Operation)	2205.4	d. Other Known Monitor Downtime Cause.....	0.8
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	2.1
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.10%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: L Dee Shakespear

Signature: 

Title: Air Quality Environmental Engineer

Date: 1-15-15

Navajo Unit 2 Excess Wet Opacity Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 2 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason	Action
10/01/14 00:00 - 10/22/14 03:28		507.4	Wet Scrubber Operation	Exempt
10/22/14 06:02 - 12/31/14 23:59		1698.0	Wet Scrubber Operation	Exempt

Total Duration: 2205.4 Hours

Navajo Unit 2 Excess Dry Opacity Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason
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Total Duration 0.0 Hours

Navajo Unit 2 Opacity Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 2 Opacity SOURCE: Unit 2 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
10/07/14 15:30 - 10/07/14 15:41		12	Preventative Maintenance Activities
10/22/14 15:24 - 10/22/14 15:29		06	Preventative Maintenance Activities
10/27/14 20:00 - 10/27/14 20:05		06	Data Controller Malfunction
10/28/14 06:18 - 10/28/14 06:23		06	Data Controller Malfunction
11/06/14 10:30 - 11/06/14 10:41		12	Preventative Maintenance Activities
12/18/14 12:48 - 12/18/14 13:41		54	Quality Assurance Activities
12/23/14 09:30 - 12/23/14 09:41		12	Preventative Maintenance Activities
12/24/14 02:42 - 12/24/14 02:47		06	Data Controller Malfunction
12/27/14 12:06 - 12/27/14 12:11		06	Data Controller Malfunction
12/29/14 10:30 - 12/29/14 10:36		06	Preventative Maintenance Activities

TOTAL DURATION = 2.1 Hours

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 10/01/2014 00:00 through 12/31/2014 23:59

Pollutant: SO2 lb/mmBTU (365 Boiler Operating Day rolling average)
Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 2
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2196.6 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.0
c. Process Problems.....	0.0	c. Quality Assurance.....	2.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause.....	2.0
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	4.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.18%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statment(s) made in this document or its attachments may be punishable as a criminal offense."

Name: L Dee Shakespear

Signature: 

Title: Air Quality Environmental Engineer

Date: 1-15-15

Navajo Unit 2 SO2 Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 1.0 lb/mmBTU, 3 hr. plant wide average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 2 SO2 Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.1 lb/mmBTU, 365 BOD rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 2 SO2 Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 2 SO2 ppm SOURCE: Unit 2 EPISODE: SO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
10/22/14 10:00 - 10/22/14 10:59		1	Quality Assurance Activities
11/13/14 10:00 - 11/13/14 10:59		1	Quality Assurance Activities
12/02/14 14:00 - 12/02/14 15:59		2	Preventative Maintenance Activities

Total Duration = 4.0 hrs

Navajo Unit 2 CO2 Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 2 CO2 cor SOURCE: Unit 2 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
10/22/14 10:00 - 10/22/14 10:59		1	Quality Assurance Activities
11/13/14 10:00 - 11/13/14 10:59		1	Quality Assurance Activities
12/02/14 14:00 - 12/02/14 15:59		2	Preventative Maintenance Activities

Total Duration = 4.0 hrs

Navajo Unit 2 NOx Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.24 lb/mmBTU, 30 Day rolling average

Date and Time Period	Magnitude	Reason
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 2 NOx Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 2 NOx cor SOURCE: Unit 2 EPISODE: NOx Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
10/22/14 10:00 - 10/22/14 10:59		1	Quality Assurance Activities
11/13/14 10:00 - 11/13/14 10:59		1	Quality Assurance Activities
12/02/14 14:00 - 12/02/14 15:59		2	Preventative Maintenance Activities

Total Duration = 4.0 hrs

Navajo Unit 2 CO Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.23 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 2 CO Excess Emission Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.15 lb/mmBTU, 12-Month rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 2 CO Downtime Report

SRP - Navajo, Unit 2
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 2 CO cor SOURCE: Unit 2 EPISODE: CO Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
10/22/14 10:00 - 10/22/14 10:59		1	Quality Assurance Activities
11/13/14 10:00 - 11/13/14 10:59		1	Quality Assurance Activities
12/02/14 14:00 - 12/02/14 15:59		2	Preventative Maintenance Activities

Total Duration = 4.0 hrs

Unit 3

UNIT 3 REPORT SUMMARY

- Daily Electric Energy Report
- Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- Excess Dry Opacity Report
- Opacity Downtime Report
- SO₂ Excess Emission and Monitoring System Performance
- SO₂ Excess Emission Report – 1.0 lb/mmBTU
- SO₂ Excess Emission Report – 0.1 lb/mmBTU
- SO₂ Downtime Report
- CO₂ Downtime Report
- NO_x Excess Emission Report
- NO_x Downtime Report
- CO Excess Emission Report- 30-Day
- CO Excess Emission Report- 12-Month
- CO Downtime Report

40 CFR 52.145.d.5.iii Daily Electric Energy Report
Gigawatt Hours

Source: Unit 3 Channel: 3 GW365

Report for 10/01/2014 thru 12/31/2014

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
10/01/14	18.40	11/01/14	16.28	12/01/14	17.84
10/02/14	19.16	11/02/14	16.17	12/02/14	19.45
10/03/14	19.41	11/03/14	17.87	12/03/14	19.44
10/04/14	19.26	11/04/14	17.68	12/04/14	19.34
10/05/14	19.27	11/05/14	18.64	12/05/14	19.37
10/06/14	19.20	11/06/14	18.68	12/06/14	19.29
10/07/14	18.62	11/07/14	18.46	12/07/14	18.93
10/08/14	18.96	11/08/14	18.98	12/08/14	18.89
10/09/14	18.57	11/09/14	17.78	12/09/14	16.96
10/10/14	18.65	11/10/14	17.71	12/10/14	14.64
10/11/14	18.92	11/11/14	18.47	12/11/14	16.99
10/12/14	18.90	11/12/14	17.93	12/12/14	18.73
10/13/14	19.41	11/13/14	17.22	12/13/14	19.37
10/14/14	19.38	11/14/14	-----	12/14/14	19.49
10/15/14	19.03	11/15/14	-----	12/15/14	19.49
10/16/14	18.88	11/16/14	-----	12/16/14	18.87
10/17/14	18.24	11/17/14	-----	12/17/14	18.94
10/18/14	17.94	11/18/14	-----	12/18/14	18.39
10/19/14	17.84	11/19/14	-----	12/19/14	18.83
10/20/14	18.27	11/20/14	-----	12/20/14	18.51
10/21/14	18.70	11/21/14	17.78	12/21/14	17.85
10/22/14	18.14	11/22/14	17.32	12/22/14	18.44
10/23/14	18.32	11/23/14	16.25	12/23/14	16.80
10/24/14	17.50	11/24/14	-----	12/24/14	17.27
10/25/14	17.13	11/25/14	-----	12/25/14	13.28
10/26/14	17.29	11/26/14	-----	12/26/14	16.56
10/27/14	18.10	11/27/14	-----	12/27/14	18.89
10/28/14	18.01	11/28/14	13.88	12/28/14	17.34
10/29/14	18.03	11/29/14	14.50	12/29/14	19.09
10/30/14	17.95	11/30/14	17.07	12/30/14	18.80
10/31/14	18.59			12/31/14	18.84

----- Invalid Boiler Operating Day

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 10/01/2014 00:00 through 12/31/2014 23:59

Pollutant: Opacity / "3 Opacity"
Emission Limit: 40

Company Name: SRP - Navajo, Unit 3
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2076.6 hours


Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	0.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	1.1
c. Process Problems.....	*89.6	c. Quality Assurance.....	0.9
d. Exempt (Wet Stack - Scrubber Operation)	2076.6	d. Other Known Monitor Downtime Cause....	0.2
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	*89.6	2. Total duration of CEMS downtime.....	2.2
3. Excess emission duration (%).....	*4.3%	3. CEMS downtime (%).....	0.11%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

*Please see cover letter and attached "Written Notification Report for Excess Emissions and Control System Outage" for explanation of potential excess emissions.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statment(s) made in this document or its attachments may be punishable as a criminal offense."

Name: L Dee Shakespear

Signature: 

Title: Air Quality Environmental Engineer

Date: 1-15-15

Navajo Unit 3 Excess Wet Opacity Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 3 Opacity SOURCE: Unit 3 EPISODE: Opacity Over Limit

Incident Start	Incident End	Length Hours	Reason	Action
10/01/14 00:00 - 11/15/14 02:12		1082.2	Wet Scrubber Operation	Exempt
11/17/14 01:33 - 11/18/14 23:46		46.2	Wet Scrubber Operation	Exempt
11/20/14 08:20 - 11/24/14 21:48		109.5	Wet Scrubber Operation	Exempt
11/27/14 01:18 - 12/31/14 23:59		838.7	Wet Scrubber Operation	Exempt

Total Duration: 2076.6 Hours

Navajo Unit 3 Excess Dry Opacity Report

Company: SRP - Navajo, Unit 3
 Plant: Navajo Generating Station
 City/St: Page, AZ 86040
 Types: OVER

Start: 10/01/2014 00:00
 End: 12/31/2014 23:59

Pollutant: 3 Opacity Source: : Unit 3 Episode: Opacity Over Limit

Incident Start	Incident End	Length Hrs	Reason
11/20/2014 08:24	11/20/2014 08:30	0.1	Partially plugged spray header, questionable data
11/20/2014 08:30	11/20/2014 08:36	0.1	Partially plugged spray header, questionable data
11/20/2014 08:36	11/20/2014 08:42	0.1	Partially plugged spray header, questionable data
11/20/2014 08:42	11/20/2014 08:48	0.1	Partially plugged spray header, questionable data
11/20/2014 08:48	11/20/2014 08:54	0.1	Partially plugged spray header, questionable data
11/20/2014 08:54	11/20/2014 09:36	0.1	Partially plugged spray header, questionable data
11/20/2014 09:36	11/20/2014 09:48	0.1	Partially plugged spray header, questionable data
11/20/2014 09:48	11/20/2014 13:54	0.1	Partially plugged spray header, questionable data
11/20/2014 13:54	11/20/2014 14:00	0.1	Partially plugged spray header, questionable data
11/20/2014 14:00	11/20/2014 14:06	0.1	Partially plugged spray header, questionable data
11/20/2014 14:06	11/20/2014 14:12	0.1	Partially plugged spray header, questionable data
11/20/2014 14:12	11/20/2014 14:18	0.1	Partially plugged spray header, questionable data
11/20/2014 14:18	11/20/2014 14:24	0.1	Partially plugged spray header, questionable data
11/20/2014 14:24	11/20/2014 14:30	0.1	Partially plugged spray header, questionable data
11/20/2014 14:30	11/20/2014 14:36	0.1	Partially plugged spray header, questionable data
11/20/2014 14:36	11/20/2014 14:42	0.1	Partially plugged spray header, questionable data
11/20/2014 14:42	11/20/2014 14:48	0.1	Partially plugged spray header, questionable data
11/20/2014 14:48	11/20/2014 14:54	0.1	Partially plugged spray header, questionable data
11/20/2014 14:54	11/20/2014 15:00	0.1	Partially plugged spray header, questionable data
11/20/2014 15:00	11/20/2014 15:06	0.1	Partially plugged spray header, questionable data
11/20/2014 15:06	11/20/2014 15:12	0.1	Partially plugged spray header, questionable data
11/20/2014 15:12	11/20/2014 22:30	0.1	Partially plugged spray header, questionable data
11/20/2014 22:30	11/20/2014 22:36	0.1	Partially plugged spray header, questionable data
11/20/2014 22:36	11/20/2014 22:42	0.1	Partially plugged spray header, questionable data
11/20/2014 22:42	11/20/2014 22:48	0.1	Partially plugged spray header, questionable data
11/20/2014 22:48	11/20/2014 22:54	0.1	Partially plugged spray header, questionable data
11/20/2014 22:54	11/20/2014 23:00	0.1	Partially plugged spray header, questionable data
11/20/2014 23:00	11/20/2014 23:06	0.1	Partially plugged spray header, questionable data
11/20/2014 23:06	11/20/2014 23:12	0.1	Partially plugged spray header, questionable data
11/20/2014 23:12	11/20/2014 23:18	0.1	Partially plugged spray header, questionable data
11/20/2014 23:18	11/20/2014 23:24	0.1	Partially plugged spray header, questionable data
11/20/2014 23:24	11/20/2014 23:30	0.1	Partially plugged spray header, questionable data
11/20/2014 23:30	11/20/2014 23:36	0.1	Partially plugged spray header, questionable data
11/20/2014 23:36	11/20/2014 23:42	0.1	Partially plugged spray header, questionable data
11/20/2014 23:42	11/20/2014 23:48	0.1	Partially plugged spray header, questionable data
11/20/2014 23:48	11/20/2014 23:54	0.1	Partially plugged spray header, questionable data
11/20/2014 23:54	11/21/2014 00:00	0.1	Partially plugged spray header, questionable data
11/21/2014 00:00	11/21/2014 00:06	0.1	Partially plugged spray header, questionable data
11/21/2014 00:06	11/21/2014 00:12	0.1	Partially plugged spray header, questionable data
11/21/2014 00:12	11/21/2014 00:18	0.1	Partially plugged spray header, questionable data
11/21/2014 00:18	11/21/2014 00:24	0.1	Partially plugged spray header, questionable data
11/21/2014 00:24	11/21/2014 00:30	0.1	Partially plugged spray header, questionable data
11/21/2014 00:30	11/21/2014 00:36	0.1	Partially plugged spray header, questionable data
11/21/2014 00:36	11/21/2014 00:42	0.1	Partially plugged spray header, questionable data
11/21/2014 00:42	11/21/2014 00:48	0.1	Partially plugged spray header, questionable data
11/21/2014 00:48	11/21/2014 00:54	0.1	Partially plugged spray header, questionable data
11/21/2014 00:54	11/21/2014 01:00	0.1	Partially plugged spray header, questionable data
11/21/2014 01:00	11/21/2014 01:06	0.1	Partially plugged spray header, questionable data
11/21/2014 01:06	11/21/2014 01:12	0.1	Partially plugged spray header, questionable data
11/21/2014 01:12	11/21/2014 01:18	0.1	Partially plugged spray header, questionable data
11/21/2014 01:18	11/21/2014 01:24	0.1	Partially plugged spray header, questionable data

[illegible]

[illegible]

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[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

11/24/2014 16:30	11/24/2014 16:36	0.1	Unit Shutting Down
11/24/2014 16:36	11/24/2014 16:42	0.1	Unit Shutting Down
11/24/2014 16:42	11/24/2014 16:48	0.1	Unit Shutting Down
11/24/2014 16:48	11/24/2014 16:54	0.1	Unit Shutting Down
11/24/2014 16:54	11/24/2014 17:00	0.1	Unit Shutting Down
11/24/2014 17:00	11/24/2014 17:06	0.1	Unit Shutting Down
11/24/2014 17:06	11/24/2014 17:12	0.1	Unit Shutting Down
11/24/2014 17:12	11/24/2014 17:18	0.1	Unit Shutting Down
11/24/2014 17:18	11/24/2014 17:24	0.1	Unit Shutting Down
11/24/2014 17:24	11/24/2014 17:30	0.1	Unit Shutting Down
11/24/2014 17:30	11/24/2014 17:36	0.1	Unit Shutting Down
11/24/2014 17:36	11/24/2014 17:42	0.1	Unit Shutting Down
11/24/2014 17:42	11/24/2014 17:48	0.1	Unit Shutting Down
11/24/2014 17:48	11/24/2014 17:54	0.1	Unit Shutting Down
11/24/2014 17:54	11/24/2014 18:00	0.1	Unit Shutting Down
11/24/2014 18:00	11/24/2014 18:06	0.1	Unit Shutting Down
11/24/2014 18:06	11/24/2014 18:12	0.1	Unit Shutting Down
11/24/2014 18:12	11/24/2014 18:18	0.1	Unit Shutting Down
11/24/2014 18:18	11/24/2014 18:24	0.1	Unit Shutting Down
11/24/2014 18:24	11/24/2014 18:30	0.1	Unit Shutting Down
11/24/2014 18:30	11/24/2014 18:36	0.1	Unit Shutting Down
11/24/2014 18:36	11/24/2014 18:42	0.1	Unit Shutting Down
11/24/2014 18:42	11/24/2014 18:48	0.1	Unit Shutting Down
11/24/2014 18:48	11/24/2014 18:54	0.1	Unit Shutting Down
11/24/2014 18:54	11/24/2014 19:00	0.1	Unit Shutting Down
11/24/2014 19:00	11/24/2014 19:30	0.1	Unit Shutting Down
11/24/2014 19:30	11/24/2014 19:36	0.1	Unit Shutting Down

Navajo Unit 3 Opacity Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 3 Opacity SOURCE: Unit 3 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
11/06/14 09:54 - 11/06/14 09:59		06	Preventative Maintenance Activities
11/13/14 06:42 - 11/13/14 07:23		42	Data Controller Malfunction
11/13/14 08:30 - 11/13/14 08:41		12	Data Controller Malfunction
11/13/14 15:36 - 11/13/14 15:47		12	Data Controller Malfunction
11/14/14 19:48 - 11/14/14 19:53		06	Preventative Maintenance Activities
12/18/14 14:06 - 12/18/14 14:59		54	Quality Assurance Activities

TOTAL DURATION = 2.2 Hours

40 CFR Part 60
CEM Quarterly Report
Excess Emission and Monitoring System Performance

Reporting dates 10/01/2014 00:00 through 12/31/2014 23:59

Pollutant: SO2 lb/mmBTU (365 Boiler Operating Day rolling average)
Emission Limit: 0.1


Company Name: SRP - Navajo, Unit 3
Address: Navajo Generating Station Page, AZ 86040
Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2205.0 hours

Emission Data Summary(note 1)		CEMS Downtime Summary(note 1)	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down.....	0.0	a. Monitoring Equipment Malfunction.....	2.0
b. Control Equipment Failure.....	0.0	b. Non-Monitoring Equipment Malfunction...	0.0
c. Process Problems.....	0.0	c. Quality Assurance.....	2.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause.....	0.0
e. UnKnown Excess Emissions Cause.....	0.0	e. UnKnown Monitor Downtime Cause.....	0.0
2. Total duration of excess emission.....	0.0	2. Total duration of CEMS downtime.....	4.0
3. Excess emission duration (%).....	0.00%	3. CEMS downtime (%).....	0.18%
Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.			

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: L Dee Shakespear

Signature: 

Title: Air Quality Environmental Engineer

Date: 1-15-15

Navajo Unit 3 SO2 Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 1.0 lb/mmBTU, 3 hr. plant wide average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 3 SO2 Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.1 lb/mmBTU, 365 BOD rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 3 SO2 Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 3 SO2 ppm SOURCE: Unit 3 EPISODE: SO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
11/17/14 05:00 - 11/17/14 05:59		1	Quality Assurance Activities
12/29/14 20:00 - 12/29/14 21:59		2	Analyzer Pump Failure / Repairs
12/29/14 22:00 - 12/29/14 22:59		1	Quality Assurance Activities

Total Duration = 4.0 hrs

Navajo Unit 3 CO2 Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 3 CO2 cor SOURCE: Unit 3 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
11/13/14 07:00 - 11/13/14 11:59		5	Analyzer Malfunction
11/17/14 05:00 - 11/17/14 05:59		1	Quality Assurance Activities
12/29/14 22:00 - 12/29/14 22:59		1	Quality Assurance Activities

Total Duration = 7.0 hrs

Navajo Unit 3 NOx Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.24 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 3 NOx Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 3 NOx cor SOURCE: Unit 3 EPISODE: NOx Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
11/17/14 05:00 - 11/17/14 05:59		1	Quality Assurance Activities
12/29/14 22:00 - 12/29/14 22:59		1	Quality Assurance Activities

Total Duration = 2.0 hrs

Navajo Unit 3 CO Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.23 lb/mmBTU, 30 Day rolling average

<u>Date and Time Period</u>	<u>Magnitude</u>	<u>Reason</u>
No Excess Emission		

Total Duration = 0.0 hrs

Navajo Unit 3 CO Excess Emission Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

Emission Limit: 0.15 lb/mmBTU, 12-Month rolling average

Date and Time Period	Magnitude	Reason
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No Excess Emission

Total Duration = 0.0 hrs

Navajo Unit 3 CO Downtime Report

SRP - Navajo, Unit 3
Navajo Generating Station
Page, AZ 86040

Start: 10/01/2014 00:00
End: 12/31/2014 23:59

POLLUTANT: 3 CO cor SOURCE: Unit 3 EPISODE: CO Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
11/17/14 05:00 - 11/17/14 05:59		1	Quality Assurance Activities
12/29/14 22:00 - 12/29/14 22:59		1	Quality Assurance Activities

Total Duration = 2.0 hrs

Clip

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298

ROBERT K. TALBOT

Manager

January 21, 2015

Mr. Stephen B. Etsitty, Executive Director
Navajo Nation Air Quality/Operating Permit Program
Rt. 112 North, Bldg. 2427
P.O. Box 529
Fort Defiance, AZ 86504

Re: *Navajo Generating Station*
Annual Compliance Certification and Semiannual Monitoring Report
Permit No. NN-ROP-05-06

Dear Mr. Etsitty:

As required by 40 CFR § 71.6(a)(5), 40 CFR § 71.6(a)(3)(iii)(A), and Conditions IV.C and III.C.1 of the above referenced permit, please find enclosed the Annual Compliance Certification (Attachment 1) and Semiannual Monitoring Report (Attachments 2 and 3) for Navajo Generating Station. Also enclosed, is the required Certification of Truth, Accuracy, and Completeness (Attachment 4).

Please feel free to contact me at (928) 645-6217 if you have any questions.

Sincerely,



Robert K. Talbot
Manager

Certified Mail

cc: Roger Kohn, USEPA
Barbra Sprungl, SRP

Attachment 1. Annual Compliance Certification



OMB No. 2060-0336, Approval Expires

04/30/2012

Federal Operating Permit Program (40 CFR Part 71)

ANNUAL COMPLIANCE CERTIFICATION (A-COMP)

A. GENERAL INFORMATION

Permit No. NN-ROP-05-06

Reporting Period: Beg. 01 / 01 / 2014 End. 12 / 31 / 2014

Source / Company Name SRP Navajo Generating Station

Mailing Address: Street or P.O. Box P.O. Box 850

City Page State AZ ZIP 86040 -

Contact person Robert K. Talbot Title Plant Manager

Telephone (928) 645 - 6217 Ext.

Continued on next page

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Operate in compliance with Acid Rain permit and application (Condition II.A.).

Compliance Methods for the Above (Description and Citation):

Records demonstrating compliance with the facility's Acid Rain permit and application are maintained on site and by the Designated Representative.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

SO₂ emissions less than or equal to 0.10 lb/MMBtu on a rolling 365 boiler operating day plantwide basis (Condition II.B.2).

Compliance Methods for the Above (Description and Citation):

SO₂ emissions are monitored using CEMS in accordance with the Acid Rain Program requirements and the requirements of the Visibility FIP. Records of CEMS measurements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Calculate weighted plant-wide annual average SO₂ emission rate daily (Condition II.B.3).

Compliance Methods for the Above (Description and Citation):

Records of daily calculations of weighted plant-wide average SO₂ emissions are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Install, maintain, and operate CEMS to determine compliance with the plant-wide SO₂ limit (Condition II.B.4).

Compliance Methods for the Above (Description and Citation):

Records pertaining to the installation, maintenance, and operation of the SO₂ CEMS are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Quarterly report and maintain records of SO₂ and diluent emission data according to the procedures set forth at 40 CFR 60.7, and report daily electric energy generation (Condition II.B.5a, 5b, and 5c).

Compliance Methods for the Above (Description and Citation):

Copies of the required reports and emissions data are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Notify EPA of SO₂ control system outages within 1 business day and submit a follow-up report within 30 days of repairs (Condition II.B.5d).

Compliance Methods for the Above (Description and Citation):

Outages are recorded on the CEMS DAHS, and the data is checked by environmental staff each business day. Copies of notifications to EPA of control system outages are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Operate all equipment and systems consistent with good engineering practices (Condition II.B.8).

Compliance Methods for the Above (Description and Citation):

Records of the operation and maintenance of process and control equipment are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Prepare and submit an annual long-term maintenance plan to EPA, notify EPA if less than full scheduled maintenance were conducted for the period covered by the previous plan, and explain how the facility qualified for a maintenance scheduling exception (if applicable) (Conditions II.B.9 and 10).

Compliance Methods for the Above (Description and Citation):

Copies of the required maintenance plans, records of maintenance activities, and copies of notifications are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LT1-LT14

Permit Term (Describe requirements and cross-reference)

NSPS for Nonmetallic Mineral Processing Plants. 40 CFR Part 60, Subparts A and OOO. (1) PM emissions from limestone dust collector stacks less than or equal to 0.022 gr/dscf; (2) Opacity from limestone dust collector stacks less than or equal to 7%; (3) Opacity from limestone handling fugitive sources, except crushers, less than or equal to 10%; (Condition II.D).

Compliance Methods for the Above (Description and Citation):

PM emissions performance testing is required once per permit term for DC9, DC10, and DC11, or within 120 days of any 12-month period in which visual emissions are observed 3 times. Weekly visual emissions surveys are conducted for baghouses DC9, DC10, and DC11. Copies of test reports and records of weekly visual emissions surveys are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): DC9, DC10, DC11

Permit Term (Describe requirements and cross-reference)

Emissions testing for PM (Method 5 or 17) once per permit term, and additionally within 120 days if visible emissions are observed three times from any single baghouse in any 12 month period. Provide copies of test reports to EPA (Condition II.C.4, II.E.1).

Compliance Methods for the Above (Description and Citation):

Copies of PM performance test reports are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): DC9, DC10, DC11

Permit Term (Describe requirements and cross-reference)

Weekly visual emissions survey for each baghouse, and Method 9 within 24 hours of observing any visible emissions (Condition II.C.5, II.E.2). Keep records for each observation (Condition II.E.3).

Compliance Methods for the Above (Description and Citation):

Records of weekly visual emissions surveys are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LT1-LT14

Permit Term (Describe requirements and cross-reference)

Keep records of the occurrence and duration of any startup, shutdown, and malfunction of affected facilities; malfunction of air pollution control equipment; and periods during which continuous monitoring devices are inoperative (Condition II.C.2).

Compliance Methods for the Above (Description and Citation):

Operating records for affected facilities and control equipment are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): LT1-LT14

Permit Term (Describe requirements and cross-reference)

At all times, maintain and operate equipment, to the extent practicable, consistent with good air pollution control practices for minimizing emissions (Condition II.C.7).

Compliance Methods for the Above (Description and Citation):

Maintenance and operating records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)

Conduct testing in accordance with the generic requirements for testing contained in the permit (Condition III.A).

Compliance Methods for the Above (Description and Citation):

Copies of test plans and test reports containing information required by the generic testing requirements of the permit are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)

Keep records of required monitoring information for at least 5 years (Condition III.B).

Compliance Methods for the Above (Description and Citation):

Monitoring records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)

Submit semiannual monitoring reports (Condition III.C.1) and an annual compliance certification (Condition IV.C).

Compliance Methods for the Above (Description and Citation):

Copies of monitoring reports and compliance certifications are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)

Report deviations promptly (Condition III.C.2 and 3).

Compliance Methods for the Above (Description and Citation):

Reports filed: Unit 3 on February 24, 2014, Unit 3 on June 13, 2014, Unit 3 on November 24 and 25, 2014 and Unit 2 on December 4, 2014.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)

Comply with stratospheric ozone provisions of 40 CFR Part 82 (Condition III.D).

Compliance Methods for the Above (Description and Citation):

Records required by 40 CFR Part 82 are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)
Comply with Asbestos NESHAP provisions (Condition III.E).

Compliance Methods for the Above (Description and Citation):
Records of demolition and renovation activities are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Plantwide

Permit Term (Describe requirements and cross-reference)
Complete a fee calculations worksheet form and pay annual permit fees by April 1 of each year (Condition IV.A).

Compliance Methods for the Above (Description and Citation):
Copies of emission fee calculations worksheets and records of emission fee payments are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)
Submit notification of the date construction of Low-NOx Burners and Separated Overfire Air (LNB/SOFA) is commenced, postmarked within 30 days of such date. (PSD Permit AZ 08-01A Condition II.A)

Compliance Methods for the Above (Description and Citation):
Notification was submitted for Unit 3 on February 19, 2009 and for Unit 2 on February 22, 2010, and for Unit 1 on February 17, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)
Submit notification of the date upon which initial performance tests will commence, postmarked not less than 30 days prior to such date. (PSD Permit AZ 08-01A Condition II.C)

Compliance Methods for the Above (Description and Citation):
Notification was submitted for Unit 3 on March 5, 2009 and for Unit 2 on March 11, 2010 and Unit 1 on April 4, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1,U2, U3

Permit Term (Describe requirements and cross-reference)

Submit notification of the date upon which initial performance evaluation of the CEMS will commence, postmarked not less than 30 days prior to such date. (PSD Permit AZ 08-01A Condition II.D)

Compliance Methods for the Above (Description and Citation):

Notification was submitted for Unit 3 on March 5, 2009 and for Unit 2 on March 11, 2010 and Unit 1 on April 4, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Prior to commencement of installation, submit design specifications of the LNB/SOFA system to be installed. (PSD Permit AZ 08-01A Condition IX.A.1)

Compliance Methods for the Above (Description and Citation):

Notification was submitted for Unit 3 on January 23, 2009 and for Unit 2 February 22, 2010 and Unit 1 on February 17, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

At least one month prior to the date of initial startup, submit an LNB/SOFA system operating plan. (PSD Permit AZ 08-01A Condition IX.A.2)

Compliance Methods for the Above (Description and Citation):

Notification was submitted for Unit 3 on February 19, 2009 and for Unit 2 on February 22, 2010 and Unit 1 on February 17, 2011.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Within 60 days of installation of the low-NOx burners, install, and thereafter operate, maintain, certify, and quality assure CEMS for CO (PSD Permit AZ 08-01A Condition IX.E.1). Submit CO CEMS performance test protocol 30 days prior to test date, and results of performance test within 60 days of completion (PSD Permit AZ 08-01A Condition IX.E.5 and IX.E.6).

Compliance Methods for the Above (Description and Citation):

Copies of the performance test protocol (submitted for Unit 3 on March 5, 2009 and Unit 2 on March 11, 2010 and Unit 1 on April 4, 2011) and performance test results (submitted for Unit 3 on June 7, 2009 and for Unit 2 on July 1, 2010 and Unit 1 on June 28, 2011) are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Following initial startup of low-NOx burners, $\text{NO}_x \leq 0.24 \text{ lb/MMBtu}$, $\text{CO} \leq 0.23 \text{ lb/MMBtu}$ on a 30-day rolling average basis and $\text{CO} \leq 0.15 \text{ lb/MMBtu}$ on a 12-month rolling average basis (PSD Permit AZ 08-01A Condition IX.B.2 and Condition IX.B.1.a & b.). Submit excess emission reports semiannually 30 days after the end of each calendar quarter (PSD Permit AZ 08-01A Condition IX.G.5).

Compliance Methods for the Above (Description and Citation):

Copies of the semiannual excess emissions reports for this reporting period (submitted on April 29, 2014, July 30, 2014, October 28, 2014 and January 21, 2015 are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Conduct a thirty day initial performance test for CO and NOx using the CEMS. Submit a report within 30 days of completion of the test (PSD Permit AZ 08-01A Condition IX.F).

Compliance Methods for the Above (Description and Citation):

Copies of the performance test results (submitted for Unit 3 on June 7, 2009, Unit 2 on July 1, 2010 and Unit 1 on June 28, 2011) are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Maintain records of hours of operation, amount of fuel used, and emission calculations for emission limits defined in Condition II.B.2 (PSD Permit AZ 08-01A Condition IX.G.1, IX.G.2, and IX.G.3).

Compliance Methods for the Above (Description and Citation):

Copies of the required records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Maintain CEMS records that contain the following: occurrence and duration of any startup, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, maintenance, duration of any periods during which a continuous monitoring system or monitoring device is inoperative, and emissions measurements (PSD Permit AZ 08-01A Condition IX.G.4).

Compliance Methods for the Above (Description and Citation):

Copies of the required records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

After the 18 month Demonstration Period for each LNB/SOFA system, the Permittee shall submit to EPA a written report together with CO CEMS data showing actual CO emissions which evaluates whether a lower CO emissions limit can be consistently and reasonably achieved while maintaining NOx emission levels at or below 0.24 lb/MMBtu on a 30-day rolling average (PSD Permit AZ 08-01A Condition IX.C.2).

Compliance Methods for the Above (Description and Citation):

Report for Unit 3 was submitted on November 15, 2010, Unit 2 on January 20, 2012 and Unit 1 on January 8, 2013. Copies of the required records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, & U3

Permit Term (Describe requirements and cross-reference)

SO₂ ≤ 1.0 lb/MMBtu from Units 1, 2, and 3, averaged over any 3-hour period, on a plant-wide basis. Maintain and operate CEMS for SO₂ on Units 1, 2, and 3, and comply with quality assurance procedures found in 40 CFR Part 75 (Condition II.A.2.a of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Records and copies of reports demonstrating compliance with these requirements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, & U3

Permit Term (Describe requirements and cross-reference)

PM ≤ 0.060 lb/MMBtu on a plant-wide basis, as determined by annual mass emission tests, based on an average of at least three sampling runs per stack (Condition II.A.2.b of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of test reports demonstrating compliance with the PM limit are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2 & U3

Permit Term (Describe requirements and cross-reference)

Opacity ≤ 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and ≤40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Records and copies of reports demonstrating compliance with these requirements are maintained on site.

Unit 3 report filed on February 24, 2014, Unit 3 report filed on June 13, 2014 and Unit 3 report filed November 24, 2014 and November 25, 2014

Status (Check one): ☒ Intermittent Compliance ☐ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): Auxiliary Boiler

Permit Term (Describe requirements and cross-reference)

During any calendar year in which an auxiliary boiler is operated for 720 hours or more, and at any other time requested by the Administrator, conduct mass emission tests for SO₂, NO_x, and PM (Condition II.A.3.c of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

No testing was required during this reporting period.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Fugitive Dust Sources

Permit Term (Describe requirements and cross-reference)

Operate and maintain the existing dust suppression methods for controlling dust from the coal handling and storage facilities. Submit a description of the dust suppression methods for controlling dust from the coal handling and storage facilities, fly ash handling and storage, and road sweeping activities. Opacity ≤ 20% from any crusher, grinding mill, screening operation, belt conveyor, truck loading and unloading operation, or railcar unloading station, as determined using 40 CFR Part 60, Appendix A-4, Method 9 (Condition II.A.2.c of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of the records demonstrating compliance with these requirements are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): Monitoring Station

Permit Term (Describe requirements and cross-reference)

Install, maintain and operate ambient monitors at Glen Canyon Dam for PM_{2.5}, PM₁₀, NO₂, SO₂ and ozone. Report data to the Regional Administrator annually (Condition II.A.3.f of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of records and reports demonstrating compliance with this requirement are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Monitor parameters per CAM Requirements (Condition II.C.1 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of records and reports demonstrating compliance with this requirement are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Continuously monitor and log measurements of parameters for each ESP unit and wet limestone scrubber (Condition II.C.3 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Copies of records and reports demonstrating compliance with this requirement are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

At all times, maintain monitoring equipment and maintain necessary parts for repairs of the monitoring equipment (Condition II.C.4 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Maintenance records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

At all times the pollutant-specific emissions unit is in operation, all monitoring shall be conducted in continuous operation (Condition II.C.5 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Monitoring records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

B. COMPLIANCE STATUS

Describe the compliance status of each permit term for the reporting period. Copy this page as many times as necessary to cover all permit terms and conditions.

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Upon detecting an excursion, restore operation of the emission unit to normal operation consistent with good air pollution control practices for minimizing emissions (Condition II.C.6 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Maintenance and operating records are maintained on site.

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance

Emission Unit ID(s): U1, U2, U3

Permit Term (Describe requirements and cross-reference)

Report excursions or exceedances and the action taken to implement a Quality Improvement Plan (QIP) (Condition II.C.9 of Permit Reopening).

Compliance Methods for the Above (Description and Citation):

Unit 3 report filed on June 13, 2014

Status (Check one): ☐ Intermittent Compliance ☒ Continuous Compliance*

*Continuous compliance except for required detuning of ESP for EPA PS-11 testing.

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a possible exception to compliance. Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: Permit Term (Describe requirements and cross-reference) Opacity \leq 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and \leq 40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening) and Monitor, log and record parameters according to the requirements in the CAM plan. Excursions or exceedances shall be reported and Quality Improvement Plan (QIP) shall be implemented if excursions occur (Condition II.C. of Permit Reopening).

Emission Units (unit IDs): Unit 3

Deviation Start 02 / 22 / 2014 04 : 30 End: 02 / 22 / 2014 08 : 35

Date Written Report Submitted 02 / 24 / 2014

Permit Term for Which There was a Deviation: Permit Term (Describe requirements and cross-reference) Opacity \leq 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and \leq 40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening) and Monitor, log and record parameters according to the requirements in the CAM plan. Excursions or exceedances shall be reported and Quality Improvement Plan (QIP) shall be implemented if excursions occur (Condition II.C. of Permit Reopening).

Emission Units (unit IDs): Unit 3

Deviation Start 06 / 12 / 2014 10 : 54 End: 06 / 12 / 2014 18 : 05

Date Written Report Submitted 06 / 13 / 2014

*Required detuning of ESP for EPA PS-11 testing.

C. DEVIATIONS FROM PERMIT TERMS AND CONDITIONS

Report all deviations from permit terms (whether reported previously or not) that occurred during the permit term. Cross-reference deviations already reported in the six-month report. Indicate whether each deviation is a possible exception to compliance. Start and end period of each deviation should be in mo/day/yr, hr:min format (24-hour clock). Also specify the date when the written deviation report was submitted (If written report required, but not submitted, leave the date field blank).

Permit Term for Which There was a Deviation: Permit Term (Describe requirements and cross-reference) Opacity \leq 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and \leq 40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening).

Emission Units (unit IDs): Unit 3

Deviation Start 11 / 20 / 2014 08 : 24 End: 11 / 24 / 2014 19 : 30

Date Written Report Submitted 11 / 24 / 2014 & Follow up on 11 / 25 / 2014

*Suspect opacity values indicative of sub-saturated stack conditions.

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____ / ____ / ____ ____ : ____ End: ____ / ____ / ____ ____ : ____

Date Written Report Submitted ____ / ____ / ____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs):

Deviation Start ____ / ____ / ____ ____ : ____ End: ____ / ____ / ____ ____ : ____

Date Written Report Submitted ____ / ____ / ____

Attachment 2. Semiannual Monitoring Report



OMB No. 2060-0336, Approval Expires 04/30/2012

Federal Operating Permit Program (40 CFR Part 71)

6-MONTH MONITORING REPORT (SIXMON)

Section A (General Information)

Permit No. NN-ROP-05-06

Reporting Period: Beg. 7 / 1 / 2014 End. 12 / 31 / 2014

Source / Company Name SRP Navajo Generating Station

Mailing Address: Street or P.O. Box P.O. Box 850

City Page State AZ ZIP 86040 -

Contact person Robert K. Talbot Title Plant Manager

Telephone (928) 645 - 6217 Ext.

Continued on next page

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis Required by the Permit	Emission Units (Unit IDs)	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
<p>Continuous emission monitoring for NO_x (Condition 2 and Attachment A, Acid Rain Permit NN-07-01). Each unit is subject to an annual average NO_x limit of 0.40 lb/MMBtu pursuant to 40 CFR 76.8(d)(2) (NO_x early election compliance plan).</p> <p>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Acid Rain EDRs to EPA</p> <p><u>10</u> / <u>22</u> / <u>2014</u> <u>1</u> / <u>19</u> / <u>2015</u></p>
<p>Continuous emission monitoring for SO₂ (Condition 1 and Attachment A, Acid Rain Permit NN-07-01). Each unit is subject to an annual SO₂ Acid Rain (Phase II) allowance allocation.</p> <p>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Acid Rain EDRs to EPA</p> <p><u>10</u> / <u>22</u> / <u>2014</u> <u>1</u> / <u>19</u> / <u>2015</u></p>
<p>Continuous emission monitoring for SO₂ (Conditions II.B.3, II.B.4, and II.B.5). The facility is subject to a plantwide rolling 365 boiler operating day average emission limit of 0.10 lb/MMBtu pursuant to Condition II.B.2 and 40 CFR 52.145(d)(2) (Visibility).</p> <p>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Excess Emission Reports to EPA Region IX</p> <p><u>10</u> / <u>28</u> / <u>2014</u> <u>1</u> / <u>21</u> / <u>2015</u></p>
<p>Weekly visible emission survey, with follow up Method 9 within 24 hours if visible emissions are observed (Condition II.C.5, II.D.1, II.D.2, II.E.2, and II.E.3). Stack emissions from transfer point ≤ 7% opacity, and fugitive emissions ≤ 10% opacity, pursuant to NSPS Subpart OOO.</p> <p>Records demonstrating compliance with this condition are included in Attachment 3 of this report.</p>	DC9, DC10, DC11	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p>Once per 5-year permit term and at other times specified by the EPA, conduct PM performance tests for exhaust from DC9, DC10, and DC11 using EPA Method 5 or 17. Conduct a performance test within 120 days if visible emissions are observed 3 times from any one baghouse during a consecutive 12-month period (Condition II.E.1).</p> <p>The required performance test was conducted as required during the current permit term (i.e., prior to 7/3/2013). A report demonstrating compliance with this requirement was submitted to EPA on the date indicated. Visible emissions were observed more than three times during the year on DC11 which resulted in performance testing being conducted November 7, 2011 and the report demonstrating compliance with the emissions limit being submitted January 9, 2012.</p>	DC9, DC10, DC11	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p><u>10</u> / <u>20</u> / <u>2009</u></p> <p>Attachment ID _____</p>
<p>Within 60 days of installation of the low-NO_x burners, install, and thereafter operate, maintain, certify, and quality assure CEMS for CO (PSD Permit AZ 08-01A Condition IX.E.1). Submit CO CEMS performance test protocol 30 days prior to test date, and results of performance test within 60 days of completion (Condition II.B.5 and II.B.6 of Permit Reopening).</p> <p>Performance tests were conducted on the low-NO_x burners on Unit 3 in 2009, Unit 2 in 2010, and Unit 1 in 2011.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p><u>6</u> / <u>28</u> / <u>2011</u></p> <p>Attachment ID ____</p>

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis Required by the Permit	Emission Units (Unit IDs)	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
<p>Following initial startup of low-NO_x burners, NO_x ≤ 0.24 lb/MMBtu (PSD Permit AZ 08-01A Condition IX.B.2), CO ≤ 0.23 lb/MMBtu on a 30-day rolling average basis (PSD Permit AZ 08-01A Condition IX.B.1.a) and CO ≤ 0.15 lb/MMBtu on a 12-Month rolling average basis (PSD Permit AZ 08-01A Condition IX.B.1.b). Submit excess emission reports semiannually 30 days after the end of each calendar quarter (PSD Permit AZ 08-01A Condition IX.G.5).</p> <p>Reports demonstrating compliance with this requirement were submitted to EPA on the date indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Excess Emission Report to EPA Region IX</p> <p><u>10 / 28 / 2014</u></p> <p><u>1 / 21 / 2015</u></p>
<p>Conduct a thirty day initial performance test for NO_x and CO with the CEMS starting the day after successful completion of the performance testing for the CO CEMS. Submit report within 30 days of completion (PSD Permit AZ 08-01A Condition IX.F).</p> <p>Performance test results were submitted for Unit 3 in 2009, Unit 2 in 2010 and Unit 1 in 2011.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p><u>6 / 28 / 2011</u></p> <p>Attachment ID _____</p>
<p>After the 18 month Demonstration Period for each LNB/SOFA system, the Permittee shall submit to EPA a written report together with CO CEMS data showing actual CO emissions which evaluates whether a lower CO emissions limit can be consistently and reasonably achieved while maintaining NO_x emission levels at or below 0.24 lb/MMBtu on a 30-day rolling average (PSD Permit AZ 08-01A Condition IX.C.2).</p> <p>A report meeting this requirement was submitted to EPA on 11/15/2010 for Unit 3, on 1/20/2012 for Unit 2 and 1/08/2013 for Unit 1.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p><u>1 / 08 / 2013</u></p> <p>Attachment ID _____</p>
<p>SO₂ ≤ 1.0 lb/MMBtu from Units 1, 2, and 3, averaged over any 3-hour period, on a plantwide basis (Condition II.A.2 of Permit Reopening). Maintain and operate CEMS for SO₂ on Units 1, 2 and 3 in accordance with 40 CFR 60.8 and 60.13(e), (f), and (h), and Appendix B of Part 60. Comply with the quality assurance procedures for CEMS found in (Condition II.A.3 of Permit Reopening).</p> <p>Reports demonstrating compliance with this requirement were submitted to EPA on the dates indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Excess Emission Report to EPA Region IX</p> <p><u>10 / 28 / 2014</u></p> <p><u>1 / 21 / 2015</u></p>
<p>PM ≤ 0.060 lb/MMBtu, on a plantwide basis, as determined by annual mass emissions tests conducted on Units 1, 2, and 3, operating at rated capacity, using coal that is representative of that normally used (Condition II.A.2.b of Permit Reopening).</p> <p>A report demonstrating compliance with this requirement was submitted to EPA on the date indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p><u>7 / 30 / 2014</u></p> <p>Attachment ID _____</p>
<p>Opacity from the stacks of Units 1, 2, or 3 ≤ 20%, excluding condensed uncombined water droplets, averaged over any six (6) minute period. Opacity from the stacks of Units 1, 2 or 3 ≤ 40% opacity, averaged over six (6) minutes, during absorber upset transition periods. Maintain and operate COMS on Units 1, 2, and 3 in accordance with CFR 60.8 and 60.13(e), (f), and (h), and Appendix B of Part 60, and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening). (NGS FIP – 40CFR §49.24(d)(4) and §49.24(e)(1)).</p> <p>Reports demonstrating compliance with this requirement were submitted to the EPA on the dates indicated.</p>	U1, U2, U3	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Excess Emission Report to EPA Region IX</p> <p><u>10 / 28 / 2014</u></p> <p><u>1 / 21 / 2015</u></p>

Section B (Monitoring Report)

Summarize all required monitoring, data, or analyses required by the permit for the reporting period. Describe and cross-reference the permit term and list the emission units (Unit IDs) where the monitoring was performed. Indicate whether a separate monitoring report is required, and if required, enter the date submitted. If submitted for the first time as an attachment to this form, assign an attachment ID, mark the attachment with that ID, and attach the report to this form.

Monitoring, Data, or Analysis Required by the Permit	Emission Units (Unit IDs)	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
<p>Operate and maintain the existing dust suppression methods for controlling dust from the coal handling and storage facilities. Submit a description of the dust suppression methods for controlling dust from the coal handling and storage facilities, fly ash handling and storage, and road sweeping activities. Opacity < 20% from any crusher, grinding mill, screening operation, belt conveyer, truck loading and unloading operation, or railcar unloading station, as determined using 40 CFR Part 60, Appendix A-4, Method 9 (Condition II.A.2.c of Permit Reopening).</p> <p>Records demonstrating compliance with these requirements are maintained on site.</p>	Fugitive Dust	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>6 / 04 / 2010</u> Attachment ID _____
<p>During any calendar year in which an auxiliary boiler is operated for 720 hours or more, and at other times as requested by the Administrator, conduct mass emissions tests for SO₂, NO_x and /or PM on the auxiliary steam boilers, operating at rated capacity, using oil that is representative of that normally used. (Condition II.A.3.c of Permit Reopening).</p> <p>The auxiliary boiler was not operated for more than 720 hours this year, and no testing has been requested. Therefore, no testing was required during this reporting period.</p>	Aux Boiler	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<u> / / </u> Attachment ID _____
<p>Maintain and operated ambient monitors at Glen Canyon Dam for PM_{2.5}, PM₁₀, NO_x, SO₂ and ozone. Report data annually to the Regional Administrator (Condition II.A.3.f of Permit Reopening).</p> <p>The required annual report demonstrating compliance with this requirement will be submitted within the 60 days after year end.</p>	Ambient Monitors	<input type="checkbox"/> Yes <input type="checkbox"/> No	<u>2 / 26 / 2014</u> Attachment ID _____
<p>Monitor, log and record parameters according to the requirements in the CAM plan. Excursions or exceedances shall be reported and Quality Improvement Plan (QIP) shall be implemented if excursions occur (Condition II.C. of Permit Reopening).</p> <p>Records demonstrating compliance with these requirements are maintained on site.</p>	U1, U2, U3	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<u> / / </u> Attachment ID _____

Section C (Deviations Already "Promptly" Reported)

Summarize all deviations from permit terms already reported on form **PDR** during the reporting period. Copy this page as many times as necessary to include all such deviations. Describe and cross-reference the permit terms and report the start and end dates and times of the deviations (mo/day/yr, hr:min). Use the 24-hour clock. Also specify the date when the written deviation report was submitted to the permitting authority (If written report required, but not submitted, leave the date field blank). Note that failure to submit a deviation report, or late submittal, is a deviation that must be reported in the Section D.

Permit Term for Which There was a Deviation: Permit Term (Describe requirements and cross-reference) Opacity \leq 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and \leq 40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening)

Emission Units (unit IDs): Unit 3

Deviation Start 11 / 20 / 2014 08 : 24 End: 11 / 24 / 2014 19 : 30

Date Written Report Submitted 11 / 24 / 2014 & Follow up on 11 / 25 / 2014

*Suspect opacity values indicative of sub-saturated stack conditions.

Permit Term for Which There was a Deviation:

Emission Units (unit IDs): Unit 3

Deviation Start ____ / ____ / ____ ____ : ____ End: ____ / ____ / ____ ____ : ____

Date Written Report Submitted ____ / ____ / ____

Permit Term for Which There was a Deviation:

Emission Units (unit IDs): Unit 3

Deviation Start ____ / ____ / ____ ____ : ____ End: ____ / ____ / ____ ____ : ____

Date Written Report Submitted ____ / ____ / ____

Section D (Deviations Reported Semiannually)

This section is for deviations reported for the first time in this six-month monitoring report. Describe and cross-reference the permit terms and emission units that apply to the deviation. Copy this page as many times as necessary to include all such deviations. Report the beginning and ending times (mo/day/yr, hr:min) for each deviation. Use the 24-hour clock. Briefly explain (if known) the probable cause of each deviation. If any corrective actions or preventative measures have been taken to avoid these in the future, briefly describe the measures, including when they occurred.

Permit Term (for Which There is a Deviation): Opacity \leq 20% from Units 1, 2, and 3, excluding uncombined water droplets, averaged over any 6 minute period and \leq 40%, averaged over any 6 minute period during absorber upset transition periods. Maintain and operate Continuous Opacity Monitoring Systems (COMS) on Units 1, 2, and 3 and comply with the quality assurance procedures in 40 CFR Part 75 (Condition II.A.2.d of Permit Reopening)

Emission Units (unit IDs) Unit 3

Deviation Start: 11 / 24 / 2014 08 : 24 End: 11 / 24 / 2014 19 : 30

Probable Cause of Deviation: SO₂ Absorber Spray Header partially plugged causing potential opacity exceedances due to the flue gas possibly dropping below the saturation point.

Corrective Actions or Preventative Measures Taken: Boiler and associated SO₂ Absorbers taken off line for inspection. Spray header / spray nozzles were unplugged before returning to service.

*Suspect opacity values indicative of sub-saturated stack conditions associated with partial pluggage of SO₂ Absorber spray header reported as opacity excess emissions.

Permit Term (for Which There is a Deviation):

Emission Units (unit IDs) Unit 3

Deviation Start: / / : End: / / :

Probable Cause of Deviation:

Corrective Actions or Preventative Measures Taken:

**Attachment 3. Summary of Limestone Handling System
Visible Emissions Observations**

Navajo Generating Station
Summary of Limestone Handling System Visible Emissions Observations
Permit No. NN-ROP-05-06, Condition II.E.2 and II.E.3

Period beginning: 07 / 01 / 14

Period ending: 12 / 31 / 14

Date	Units Observed	Observer Initials	Visible Emissions?	Comments
07/07/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/14/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/21/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
07/28/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/04/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/11/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/18/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
08/26/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/02/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/08/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
09/15/14	DC9, DC10, DC11	WHB	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Intermittent dust on DC-11, unable to take readings
09/22/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/01/14	DC9, DC10, DC11	LDS	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/06/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/13/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/20/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
10/27/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/04/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/13/14	DC9, DC10, DC11	LDS	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/17/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
11/24/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/01/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/08/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/15/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/22/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12/29/14	DC9, DC10, DC11	WHB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Attachment 4. Certification of Truth, Accuracy, and Completeness



APPLICATION FOR PART 71 FEDERAL OPERATING PROGRAM
 NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY
 NAVAJO NATION AIR QUALITY CONTROL PROGRAM



FORM CTAC – CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS BY RESPONSIBLE OFFICIAL

INSTRUCTIONS: One copy of this form must be completed, signed and sent with each submission of documents (i.e. application forms, updates to applications, reports, or any information required by a Part 71 Permit)

Responsible Official - Identify the responsible official and provide contact information.

Name: (Last) Talbot (First) Robert (Middle) K.

Title: Plant Manager

Street or Post Office: P.O. Box 850

City: Page State: AZ Zip 86040

Telephone (928) 645-6217 Ext. Facsimile: (928) 645-7298

Certification of Truth, accuracy and Completeness – The Responsible Official must sign this Statement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed): 

Name (Print or Typed) Robert K. Talbot Date: 01-23-15

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298

ROBERT K. TALBOT
Manager

March 18, 2015

Mr. Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Subject: Performance Evaluation Notification for Navajo Generating Station Units 1, 2, & 3

Dear Mr. Etsitty:

In accordance with 40 CFR §63.10030(a) and 40 CFR §63.8(e) *National Emission Standards for Hazardous Air Pollutants (NESHAP): Coal- and Oil-Fired Electric Utility Steam Generating Unit* (40 CFR Part 63, Subpart UUUUU), this letter provides written notification of a performance evaluation of the continuous monitoring system at the Navajo Generating Station. Testing is scheduled to begin on May 18, 2015. Performance Specification 11 at Appendix B to 40 CFR Part 60 and Procedure 2 at Appendix F to Part 60 will be used for particulate matter (PM) Continuous Emissions Monitoring Systems (CEMS), and, Performance Specification 2 at Appendix B to 40 CFR Part 60 will be used for sulfur dioxide (SO₂) CEMS.

Catalyst Air Management will be conducting the testing.

Please call Paul Ostapuk at (928) 645-6577 if you have any further questions.

Sincerely,



Robert Talbot, Manager
Navajo Generating Station

cc: Douglas Daniel, Enforcement Office Chief, Air Division
U.S. EPA Region 9

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298

ROBERT K. TALBOT
Manager

April 9, 2015

Mr. Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Subject: Particulate Matter (PM) Performance Testing Notification for Navajo Generating Station Units 1, 2, & 3

Dear Mr. Etsitty:

In accordance with 40 CFR §63.10030(d) and 40 CFR §63.7(b) *National Emission Standards for Hazardous Air Pollutants (NESHAP): Coal- and Oil-Fired Electric Utility Steam Generating Unit* (40 CFR Part 63, Subpart UUUUU), this letter provides written notification for performance testing of Units 1, 2 and 3 at the Navajo Generating Station. Testing is scheduled to begin on May 18, 2015. Method 2 will be used for flow, Method 3A will be used for carbon dioxide concentration, Method 4 will be used for moisture if saturated stack conditions are not demonstrated and Method 5 (modified according to the requirements of Subpart UUUUU) will be used for particulate matter (PM) concentrations.

Catalyst Air Management will be conducting the testing.

Please call me at (602) 236-5256 if you have any further questions.

Sincerely,



Robert Talbot, Manager
Navajo Generating Station

cc: Douglas Daniel, Enforcement Office Chief, Air Division
U.S. EPA Region 9

bcc: P. Ostapuk
R. Talbot
L. Dee Shakespear
Walter Begay
B. Cenalmor
File: B. Sprungl/EMIS/LOC-6-15-2

NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298

ROBERT K. TALBOT
Manager

April 8, 2015

Mr. Stephen B. Etsitty, Executive Director
Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515

Subject: Performance Evaluation Notification for Navajo Generating Station Units 1, 2, & 3

Dear Mr. Etsitty:

Pursuant to 40 CFR §63.10030(a) and 40 CFR §63.8(e) *National Emission Standards for Hazardous Air Pollutants (NESHAP): Coal- and Oil-Fired Electric Utility Steam Generating Unit* (40 CFR Part 63, Subpart UUUUU), this letter provides written notification of a change in the previously scheduled performance evaluation of the continuous monitoring system at the Navajo Generating Station. Testing is still scheduled to begin on May 18, 2015, however, a performance evaluation will only be conducted for sulfur dioxide (SO₂) continuous emissions monitoring system (CEMS) according to Performance Specification 2 at Appendix B to 40 CFR Part 60.

The performance evaluation of the particulate matter (PM) Continuous Emissions Monitoring Systems (CEMS) is being postponed until a later date yet to be determined due to performance issues of the CEMS.

Please call me at (602) 236-5256 if you have any further questions.

Sincerely,



Robert Talbot, Manager
Navajo Generating Station

cc: Douglas Daniel, Enforcement Office Chief, Air Division
U.S. EPA Region 9

bcc: P. Ostapuk
R. Talbot
L. Dee Shakespear
Walter Begay
K. Watt
File: B. Sprungl/EMIS/LOC-6-15-2